

January 23, 2024

Hon. Christian F. Hummel
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

RE: Kristina Sarhadi vs. Justin Cathal Geever a/k/a Justin Sane, et al. (1:24-CV-0031)
Request for Adjournment of Rule 16 Conference under General Order #25

Your Honor:

On January 11, 2024, the Court in the above-captioned matter issued a General Order #25, attached hereto. The Order sets the Rule 16 Conference for February 26, 2024, at 9:30AM. For the reasons set out below, Plaintiff respectfully requests that the Court adjourn the Rule 16 Conference for an additional 90 days.

The matter was removed from state court by counsel for the Defendant, Hardwork Distributions, Inc., on January 9, 2024. Plaintiff received notice of removal the following day, but the docket remained restricted until Plaintiff's Counsel was admitted to the Northern District of New York on January 19, 2024. Plaintiff has neither served any Defendants in the action nor have we sent the complaint to Hardwork Distributions, Inc. or their counsel.

Accordingly, Plaintiff requires an extension to serve the complaint and summonses upon the Defendants. Moreover, Plaintiff is engaged in negotiations with Defendants that could dispose of some or all of the claims, which would be aided by additional time.

Sincerely,



Dr. Jef McAllister
Attorney for Plaintiff